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November 26, 2014

**Via ECF**

Honorable Kevin Castel  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: **John Hockenjos, Jr., v. Metropolitan Transportation  
Authority, et al. 14 CV 1679 (PKC)**

Your Honor:

We represent Plaintiff John Hockenjos, Jr. in the above-referenced action. We write now to respectfully request a ninety (90) day extension of discovery in this matter from January 12, 2015 until April 13, 2015. Defense counsel, Daniel C. Knauth, Esq., consents to this request. This is Plaintiff's first such request.

The reason for this request is that Plaintiff has been dealing with various illnesses over the past two (2) months and has recently been diagnosed with acute bronchitis. If Plaintiff's request is granted, the additional time will assist both parties. First, it will allow Plaintiff to fully respond to Defendants' discovery demands and allow the parties to complete depositions. Additionally, Defendants' attorneys are moving to another office at the end of January and the additional time will allow them to settle in to the new space. A proposed Revised Civil Case Management Plan and Scheduling Order is attached hereto as Ex. A.

Based on the foregoing, Plaintiff respectfully requests that the Court extend discovery in this matter until April 13, 2015.

We thank the Court for its consideration of this matter.

Respectfully submitted,  
/s/  
Alex Umansky (AU7961)

cc: Daniel C. Knauth, Esq.  
dknauth@mnr.org